

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 18 B 16234  
Ira Harmon, )  
 ) HON. LaShonda A. Hunt  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on April 29, 2019, at 9:30 a.m. I shall appear before the Honorable LaShonda A. Hunt in Courtroom 719 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on March 22, 2019.

/s/ Aaron Weinberg  
Attorney for Debtors

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) JVA IL, LLC

(u) Scribe Funding LLC

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**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Ira Harmon, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On June 6, 2018, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On September 24, 2018, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 100% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$570.00 monthly for 60 months.
5. Debtor fell behind on payments due to having to pay out of pocket expenses to repair his porch. As a result, Debtor accrued a plan payment default.
6. Debtor is now in a position to make regular and ongoing trustee payments.
7. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.
8. Debtor is in a position to proceed with the instant case.
9. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Aaron Weinberg  
Attorney for Debtors

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
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